

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA

CASE NO. 3:15-cv-514

Olive Cadle

Plaintiff,

FILED
CHARLOTTE, NC

OCT 26 2015

U.S. DISTRICT COURT
WESTERN DISTRICT OF NC

vs.

COMPLAINT

Mecklenburg Area Catholic Schools

Defendant(s).

A. JURISDICTION

This action is brought pursuant to Title VII of the Civil Rights Act of 1964 as amended, for employment discrimination. Jurisdiction is specifically conferred on this Court by 42 U.S.C. Section 2000e(5). Equitable and other relief are also sought under 42 U.S.C. 2000e(5)(g). Jurisdiction is also based on 28 U.S.C. Sections 1331, 1343 and 42 U.S.C. Sections 1981 et seq. Where employment discrimination based upon age is alleged, jurisdiction is conferred by 28 U.S.C. Sections 626(c)(1) and 626(e) and appropriate relief is also sought.

B. PARTIES

1. Name of Plaintiff: Olive Cadle
Address: 3411 Brickyard Lane
Midland NC, 28107
2. Name of first Defendant: Mecklenburg Area Catholic Schools
Address: 1123 South Church Street
Charlotte NC, 28203
3. Name of second Defendant: _____
Address: _____
4. Name of third Defendant: _____
Address: _____

(Use additional sheets if necessary.)

C. NATURE OF CASE

1. The address at which I sought employment or was employed by the defendant(s) is:
1123 South Church Street
Charlotte, North Carolina, 28203
2. The discriminatory acts occurred on or about:
December 1st, 2014 (Month, Day, Year)

3. I filed charges with the Equal Employment Opportunity Commission regarding the defendant's discriminatory conduct on or about:

MAY 13th, 2015 (Month, Day, Year)

4. The Equal Employment Opportunity Commission sent the attached "Notice of Right to Sue" which I received on:

July 31st, 2015 (Month, Day, Year)

5. The discriminatory acts that are the basis of this suit are:

- a. ☐ Failure to employ me.
- b. ☐ Failure to promote me.
- c. ☐ Termination of my employment.
- d. ☐ Demotion.
- e. ☒ Denied equal pay/work.
- f. ☐ Sexual harassment.
- g. ☒ General harassment.
- h. ☐ Other acts (Be specific: Attach an additional sheet if necessary)

Meeklenburg Area Catholic School launched an attack against me in the guise of a consultant firm which they advised was there to gather information about my department, to enable the department to function more

- effectively. Most of the consultants question however which were asked of my drivers pertained to my conduct towards them; how I respond to them, my work schedule, my place of worship and other information not pertaining to the job function.
6. Defendant's conduct is discriminatory with respect to:
- a. ☒ my race
 - b. ☒ my color
 - c. ☒ my sex
 - d. ☒ my religion
 - e. ☒ my national origin
 - f. ☐ my age

7. I believe that the defendant is still committing these acts against me.

YES ☐

NO ☒

The defendant is no longer committing these acts against me as I received a termination letter from them during my hospitalization of 9/21/2015.

My Employer would not accept my FMLA documents from my doctor along with my doctors apology for sending the documents past the due date. The EEOC is investigating this matter.

D. CAUSE OF ACTION

1. I allege that the defendant has discriminated against me and that the following facts form the basis for my allegations:

Count 1: I have worked my way up in my position. A male with significantly less training, experience and education was hired who was paid more than me. I was given an excessive amount of work in training him for his position.
Supporting Facts: (Describe exactly what each defendant did or did not do.)

State the facts clearly in your own words without citing any legal authority.

Use additional sheets if necessary.)

Mecklenburg Area Catholic School hired a Gentle man by the name of Lou Stevenson to oversee a group of 4 drivers and 4 Buses, I oversee 25 drivers and 35 buses. I received \$4,800 per month and Mr. Stevenson received \$6,000 per month. I have had to train and Counsel Mr. Stevenson in order for
Count 2: him to complete his job. Mecklenburg Area took away

my entire Christmas holiday, December 2014, in order for MR. Stevenson and his drivers to receive their required training for the start of the school year (Jan 2015)
Supporting Facts: I was made to work through the entire holiday,

My pay stub, Mr. Stevenson's salary on budgetary worksheet, emails of MR. Stevenson receiving Counsel from me. MR. Stevenson's PAY STUB.

At this time I'm still awaiting my files from the EEOC. Mecklenburg Area Catholic School has misrepresented the facts to EEOC. They have showed EEOC Mr. Stevenson's pay stub but neglected to let them know that my Stevenson has two jobs within the school. ^{F INJURY} They therefore appropriated MR. Stevenson's salary with the greater percentage to favor his other duties.
How have you been injured by the actions of the defendant(s)?

As a result of the defendant's actions, I have suffered mental distress, severe and documented nerve pain, insomnia, anxiety, depression, (much medical expenses) incurred.

F. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF

Have you filed other lawsuits in state or federal court that deal with the same facts that are involved in this action? YES _____ NO ✓

If your answer is "YES", describe each lawsuit. (If there are more than one lawsuits, describe additional lawsuits on additional separate pages, using the same outline.)

1. Parties to previous lawsuits:

Plaintiff(s): _____

Defendant(s): _____

2. Name of court and case or docket number: _____

3. Disposition (for example, was the case dismissed? Was it appealed? Is it still pending?)

4. Issues raised:

5. When did you file the lawsuit? _____ (Date: Month/Year)

6. When was it (will it be) decided? _____

Have you previously sought informal or form relief from the appropriate administrative officials regarding the acts complained of in Part D?

YES ✓ NO _____

If your answer is "YES" briefly describe how relief was sought and the results. If your answer is "NO" explain why administrative relief was not sought.

I did voice my concern of being paid well below MR. Stevenson and being discriminated ^{ON} for doing Four times the amount of work. My direct Supervisor offered No comment to this concern. The Human Resource Director advised that when MR. Stevenson was hired to the position of Transportation Coordinator, the administrators ask her about my salary as a guide to setting MR. Stevenson salary. THE HR director said she let them know what my salary I believe I am entitled to the following relief: was but that they did what they wanted to do anyway. I tape recorded this conversation for evidence.

G. REQUEST FOR RELIEF

I believe that I am entitled to the following relief:

- Compensatory damages (Emotional distress)
- Equitable Relief (Back Pay/Front PAY)
- Punitive damages ; Injunctive Relief

JURY TRIAL REQUESTED

YES ☒ NO ☐

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty that he/she is the plaintiff in the above action, that he/she has read the above complaint and that the information contained therein is true and correct. 28 U.S.C. §1746; 18 U.S.C. §1621.

Executed at Charlotte on 10/26/2015
(Location) (Date)

Olivia Ladd
Signature